

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

MELODY A. RUSSELL

Plaintiff,

V.

CIVIL ACTION NO.

Medical Business Bureau

Defendant.

OCTOBER 9, 2012

COMPLAINT

1. Plaintiff seeks relief pursuant to the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692; Md. Ann. Code Commercial Law Maryland Consumer Debt Collection Act. § 14-204 et seq. ("MCDCA"); and the Md. Ann. Code Commercial Law Consumer Practices Act § 13-301 et seq.
2. The Court's jurisdiction is conferred by 15 U.S.C. 1692k and 28 U.S.C. 1331 and 1367.
3. Plaintiff is a natural person who resides in Glen Burnie, MD.
4. Defendant is NOT a licensed collection agency in the State of Maryland and list a mailing address and principal place of business of 1460 Renaissance Drive, Park Ridge, IL 60068.
5. Plaintiff is a consumer within the FDCPA.
6. Defendant is a debt collector within the FDCPA.
7. Defendant is a collector within the MCDCA.

8. Defendant communicated with Plaintiff or others on or after one year before the date of this action, in connection with collection efforts with regard to Plaintiff's disputed personal debt.
9. Defendant failed to obtain a collection agency license in the State of Maryland.
10. Plaintiff contacted the Defendant and spoke to a collection agent on or about August 29, 2012.
11. Defendant failed to advise the Plaintiff of the required notice pursuant to §1692e (11).
12. Plaintiff advised the Defendant that she had already paid this debt off in full and that there was no balance of \$150.00 owed on this account.
13. The Defendant threatened to adversely affect the Plaintiff's credit rating and stated that they already reported this account on her credit bureaus.
14. In the collection efforts, the Defendant violated the FDCPA; inter alia, section 1692e and f.

**SECOND COUNT:**

15. The allegations of the First Count are repeated and realleged as if fully set forth herein.

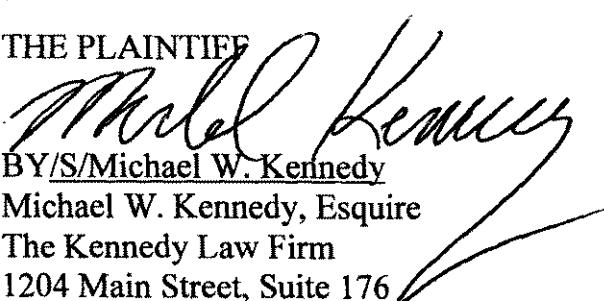
16. Within three years prior to the date of this action Defendant has engaged in acts and practices as to Plaintiff in violation of the Md. Ann. Code Commercial Law Maryland Consumer Debt Collection Act § 14-204 et seq. ("MCDCA").

17. Defendant has committed unfair or deceptive acts or practices within the meaning of the Md. Ann. Code Commercial Law Consumer Practices Act § 13-301 et seq.

**WHEREFORE** Plaintiff respectfully requests this Court to:

1. Award Plaintiff statutory damages pursuant to the FDCPA on Count I.
2. Award Plaintiff statutory damages pursuant to the MCDCA on Count II.
3. Award such other and further relief as this Court may see fit.

THE PLAINTIFF

  
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